

Exhibit 7

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: Methyl Tertiary Butyl
Ether ("MTBE") Products
Liability Litigation

Master File No.
1:00-1898

This Document Relates To:

City of Fresno
v. Chevron U.S.A. Inc., et al.,
Case No. 04 Civ. 4973

Case No.
MDL 1358(SAS)

DEPOSITION OF GLEN R. BLUE
March 17, 2011 at 1:00 (1:17) p.m.
Before: ERIC L. JOHNSON
RPR, CSR #9771

Taken at:
Fresno, California

1 A. Pardon?

2 Q. We will try to use Exhibit 2 as we go through
3 questions.

4 A. Okay.

5 Q. How long were you associated with the station
6 at 2809 South Chestnut?

7 MS. KLEAVER: Vague.

8 THE WITNESS: I don't know the exact dates.
9 Several years. I owned the station.

10 MR. STEEVES: Q. You owned --

11 A. 280 -- well, 49 -- forget 2809. I have no
12 interest in it.

13 MR. STEEVES: Excuse me. You what?

14 A. I was thinking -- it is 4090 South Chestnut.

15 Q. Right. I'd like to -- I'd like to first talk
16 about 2809 South Chestnut.

17 A. All right.

18 Q. Do you recall when you started working at Red
19 Triangle Oil Company in 2809?

20 A. What year?

21 Q. Yes.

22 A. At this location?

23 Q. Yes.

24 A. In the early '60s.

25 Q. What was your job title when you first started

1 working there?

2 A. I was a janitor, sales, warehouseman, whatever
3 had to be done. We didn't wear hats back in those days.

4 Q. And how long did you work there?

5 A. Well, I have to calculate. You told me a
6 little while ago; 30-plus years?

7 Q. So you worked there during the time period you
8 were associated with your father-in-law's business?

9 A. Yes.

10 Q. So that would have been, I think you testified,
11 through 1989?

12 A. Yes.

13 Q. Did your job duties ever change over time?
14 Were you just a jack-of-all-trades, or did you have a
15 specific title at any point?

16 A. I worked there and did what had to be done.

17 Q. Do you recall who the operator of that station
18 was at the time you were working there?

19 A. That was a company-operated store -- or
20 station. Red Triangle operated it.

21 Q. Okay. Do you recall who owned the property,
22 the actual dirt that the -- the station was on?

23 A. Arnold Hohenshelt.

24 Q. Did Arnold own the tanks as well, the --

25 A. He owned the complete facility.

1 period you worked there?

2 A. Run that by me again.

3 MS. KLEAVER: Same objection.

4 MR. STEEVES: Q. Do you recall if Red Oil
5 (sic) had an agreement to buy a certain brand of
6 gasoline during the time period you worked there?

7 MS. KLEAVER: Same objection.

8 THE WITNESS: I can't tell you who had the
9 contracts, but no doubt they did. They committed to buy
10 a certain amount of gas.

11 MR. STEEVES: Q. But you can't recall the --
12 the company?

13 MR. PARSEGHIAN: Objection; asked and answered.

14 THE WITNESS: The company bought from various
15 people over a period -- I don't know what time frame you
16 are looking at.

17 MR. STEEVES: Q. Let's start with the time
18 period in the 1980s.

19 A. The biggest supplier is Exxon. That was the
20 brand. Then they had various rebrand gas.

21 Q. You said that was the biggest supplier. Were
22 there other suppliers?

23 A. Did the company buy from other people or people
24 delivered in?

25 Q. Did the company buy from other people?

1 A. Yes.

2 Q. Do you recall who that was?

3 A. Well, we bought from Jack Griggs Oil.

4 Q. Sorry, Jack Riggs?

5 A. Griggs, G-r-i-g-g-s.

6 Q. Griggs. And do you recall the approximate time
7 period that the company was buying from --

8 A. I don't remember. I know we had Jim Harness.
9 John Harness Oil Company was a supplier of Exxon
10 products. And we -- we bought from -- I can't recall
11 everyone we bought from. Whoever had the lowest price
12 we went and bought from, called rebrand.

13 Q. Are you aware of anyone else associated with
14 the station that would have personal knowledge of these
15 supply agreements?

16 MS. KLEAVER: Vague as to time.

17 THE WITNESS: I don't know who they would be.

18 MR. STEEVES: I am going to show you a few more
19 documents associated with this site at 2809. Then we
20 will move on to the next site.

21 (Deposition Exhibit 4 marked for
22 identification)

23 MR. STEEVES: Q. Handing you what's been
24 marked as Exhibit 4. It is a Business Plan Registration
25 form for Red Triangle Oil Company dated January 31st,